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November 27, 2019

VIA ECF

Hon. John Michael Vazquez, U.S.D.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Courtroom PO 03
Newark, NJ 07101

Re: Wanda Wilson v. JP Morgan Chase, et al.,
Case No.: 2:18-cv-13789-JMV-JBC

Dear Judge Vazquez:

We represent Defendants JPMorgan Chase Bank, N.A. and Jamie Dimon (collectively, "Defendants") in the above-referenced matter, and we write in response to Plaintiff's letter of November 26, 2019, requesting to re-file her Opposition to Defendants' Motion to Dismiss the First Amended Complaint. Plaintiff purports to make this request in order to "conform" her Opposition to the Local Civil Rules. Defendants oppose this request as the filing of a re-written Opposition would be severely prejudicial.

As the Court is now aware, Plaintiff's Opposition is 48 pages in length—at 12-point, Times New Roman font¹—and drastically over the 30-page limit prescribed by Local Civil Rule 7.2(b). Plaintiff did not seek advance leave from the Court to file an over-length brief, as required. Nor does she ask the Court to accept her improper Opposition, *nunc pro tunc*. Rather, Plaintiff seeks to re-write her brief after Defendants filed their Reply, which devoted valuable space alerting the Court to the Opposition's procedural defects and requesting that it be stricken. While that alone prejudiced Defendants, an amended brief would only compound the issue.

First, Plaintiff asks to "resubmit" a modified Opposition after having reviewed the arguments advanced in Defendants' Reply and with an opportunity to improperly address those arguments. This tactic can only be intended as an impermissible attempt to file a sur-reply. Moreover, the filing of a revised Opposition—regardless of the arguments advanced therein—would require Defendants to expend valuable time and resources drafting another Reply.

¹ We note that Plaintiff's Opposition appears to be in a font even smaller than 12-point, which, in itself, is impermissible under the Rules and makes her brief ever more over-length.

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While Defendants maintain that Plaintiff's unnecessarily voluminous Opposition is improper, the prospect of an amended brief poses more significant concerns. For those reasons alone, Defendants hereby withdraw their challenge to Plaintiff's blatant violation of the prescribed page limit and consent to the over-length Opposition as initially filed.

We greatly appreciate the Court's consideration of this matter.

Respectfully submitted,

s/ Jason J. Ranjo
Jason J. Ranjo

JJR/inb

cc: All counsel of record via ECF.